

Exhibit I

Julia Longoria

From: Gore, John M. <jmgore@jonesday.com>
Sent: Wednesday, January 4, 2023 9:04 PM
To: Nina Perales; Tony Nelson; tiffany.bingham@harriscountytexas.gov; megan.cloud@weil.com; daniel.freeman@usdoj.gov; michael.stewart3@usdoj.gov; jennifer.yun@usdoj.gov; dana.paikowsky@usdoj.gov; tiffani.soo-tim@usdoj.gov; richard.dellheim@usdoj.gov; lauren.putnam@usdoj.gov; morales-doyles@brennan.law.nyu.edu; Jasleen Singh; berry@brennan.law.nyu.edu; sweren-beckere@brennan.law.nyu.edu; monzona@brennan.law.nyu.edu; sandersr@brennan.law.nyu.edu; liz.ryan@weil.com; Julia Longoria; Fatima Menendez; michael.keats@friedfrank.com; jason.kanterman@friedfrank.com; rebecca.martin@friedfrank.com; asavommatthews@elias.law; capolonio@elias.law; cdodge@elias.law; dlorenzo@elias.law; Elena Rodriguez Armenta; gwhite@elias.law; mjones@elias.law; mmcqueen@elias.law; nbaron@elias.law; unkwonta@elias.law; zachary@texascivilrightsproject.org; schen@texascivilrightsproject.org; hani@texascivilrightsproject.org; chris@texascivilrightsproject.org; jvattamala@aaldef.org; slorenzo-giguere@aaldef.org; pstegemoeller@aaldef.org; aharris@aclutx.org; skumar@aclutx.org; apeterson@jenner.com; atrepp@jenner.com; jamunson@jenner.com; Cai, Sophia L.; umittal@jenner.com; lromano@drtx.org; lsnead@drtx.org; Marisol McNair; acepedaderieux@aclu.org; asavitzky@aclu.org; smizner@aclu.org; wendy.olson@stoel.com; Franolich, Jackie; elijah.watkins@stoel.com; bradley.prowant@stoel.com; laura.rosenbaum@stoel.com; mark.bieter@stoel.com; chostetler@freespeechforpeople.org; abadat@naacpldf.org; csisco@naacpldf.org; gspencer@naacpldf.org; jholmes@naacpldf.org; koliver@naacpldf.org; ksadasivan@naacpldf.org; vgenecin@naacpldf.org; dahlrich@reedsmith.com; dlopez@reedsmith.com; kbroughton@reedsmith.com; kdulaney@reedsmith.com; kpippin@reedsmith.com; sarah.stewart@reedsmith.com; wagschlag@thearc.org; dlang@gravitystack.com; jtolbert@gravitystack.com; jean.gill@bexar.org; lisa.cubriel@bexar.org; lroberson@bexar.org; maryann.ortegon@bexar.org; noelle.butler@bexar.org; Kim Barr; barbara.nicholas@dallascounty.org; jason.schuetz@dallascounty.org; ben.stool@dallascounty.org; christine@statesuniteddemocracy.org; marina@statesuniteddemocracy.org; ranjana@statesuniteddemocracy.org; robert@statesuniteddemocracy.org; khartnett@cooley.com; mejiab@cooley.com; oarmon@cooley.com; dlouk@cooley.com; kspector@cooley.com; ghabell@cooley.com; clebel@cooley.com; Matteo, Nichole; attorney@rodriguezfirm.com; sameer.birring@harriscountytexas.gov; jonathan.fombonne@harriscountytexas.gov; Bauerband, Jacqueline (CAO); eric.nichols@butlersnow.com; karson.thompson@butlersnow.com; mckenna.tansey@butlersnow.com; victoria.giese@butlersnow.com; leigh.tognetti@da.co.hidalgo.tx.us; josephine.ramirez@da.co.hidalgo.tx.us; jacqueline.villarreal@da.co.hidalgo.tx.us; michaelj.garza@da.co.hidalgo.tx.us; Leslie Dippel; Patrick Pope; Gabe Hodge; Crosland, Stewart; Kenny, Stephen J.; Roberts, Charles E.; Will Thompson; Elizabeth Saunders; Jessica Yvarra; Ari Herbert; aaron.barnes@oag.texas.gov; Sharon Murray; zachary.berg@oag.texas.gov; kathleen.hunker@oag.texas.gov
Subject: RE: LUPE v. Abbott 5:21-cv-844 | Consolidated Plaintiffs' Amended First RFPs to Defendant Intervenors

Nina:

Thanks for sending these.

We are available for a meet-and-confer on Thursday after 3 ET, Friday after 2 ET, and Monday morning.

We'd also like to discuss the schedule and scope of the depositions.

Thanks,
John

John M. Gore
Partner

JONES DAY® - One Firm Worldwide®

51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Office +1.202.879.3930

From: Nina Perales <nperales@MALDEF.org>

Date: Wednesday, Jan 04, 2023, 7:07 PM

To: Gore, John M. <jmgore@jonesday.com>, Tony Nelson <Tony.Nelson@traviscountytx.gov>, tiffany.bingham@harriscountytx.gov <tiffany.bingham@harriscountytx.gov>, megan.cloud@weil.com <megan.cloud@weil.com>, daniel.freeman@usdoj.gov <daniel.freeman@usdoj.gov>, michael.stewart3@usdoj.gov <michael.stewart3@usdoj.gov>, jennifer.yun@usdoj.gov <jennifer.yun@usdoj.gov>, dana.paikowsky@usdoj.gov <dana.paikowsky@usdoj.gov>, tiffani.soo-tim@usdoj.gov <tiffani.soo-tim@usdoj.gov>, richard.dellheim@usdoj.gov <richard.dellheim@usdoj.gov>, lauren.putnam@usdoj.gov <lauren.putnam@usdoj.gov>, morales-doyles@brennan.law.nyu.edu <morales-doyles@brennan.law.nyu.edu>, Jasleen Singh <singhj@brennan.law.nyu.edu>, berryp@brennan.law.nyu.edu <berryp@brennan.law.nyu.edu>, sweren-beckere@brennan.law.nyu.edu <sweren-beckere@brennan.law.nyu.edu>, monzona@brennan.law.nyu.edu <monzona@brennan.law.nyu.edu>, sandersr@brennan.law.nyu.edu <sandersr@brennan.law.nyu.edu>, liz.ryan@weil.com <liz.ryan@weil.com>, Julia Longoria <Jlongoria@MALDEF.org>, Fatima Menendez <fmendez@MALDEF.org>, michael.keats@friedfrank.com <michael.keats@friedfrank.com>, jason.kanterman@friedfrank.com <jason.kanterman@friedfrank.com>, rebecca.martin@friedfrank.com <rebecca.martin@friedfrank.com>, asavomathews@elias.law <asavomathews@elias.law>, capolonio@elias.law <capolonio@elias.law>, cdodge@elias.law <cdodge@elias.law>, dlorenzo@elias.law <dlorenzo@elias.law>, Elena Rodriguez Armenta <erodriguezarmenta@elias.law>, gwhite@elias.law <gwhite@elias.law>, mjones@elias.law <mjones@elias.law>, mmcqueen@elias.law <mmcqueen@elias.law>, nbaron@elias.law <nbaron@elias.law>, unkwonta@elias.law <unkwonta@elias.law>, zachary@texascivilrightsproject.org <zachary@texascivilrightsproject.org>, schen@texascivilrightsproject.org <schen@texascivilrightsproject.org>, hani@texascivilrightsproject.org <hani@texascivilrightsproject.org>, chris@texascivilrightsproject.org <chris@texascivilrightsproject.org>, jvattamala@aalde.org <jvattamala@aalde.org>, slorenzo-giguere@aalde.org <slorenzo-giguere@aalde.org>, pstegemoeller@aalde.org <pstegemoeller@aalde.org>, aharris@aclutx.org <aharris@aclutx.org>, skumar@aclutx.org <skumar@aclutx.org>, apeterson@jenner.com <apeterson@jenner.com>, atrepp@jenner.com <atrepp@jenner.com>, jamunson@jenner.com <jamunson@jenner.com>, Cai, Sophia L. <scai@jenner.com>, umittal@jenner.com <umittal@jenner.com>, lromano@drtx.org <lromano@drtx.org>, lsnead@drtx.org <lsnead@drtx.org>, Marisol McNair <mmcnair@drtx.org>, acepedaderieux@aclu.org <acepedaderieux@aclu.org>, asavitzky@aclu.org <asavitzky@aclu.org>, smizner@aclu.org <smizner@aclu.org>, wendy.olson@stoel.com <wendy.olson@stoel.com>, Franolich, Jackie <jackie.franolich@stoel.com>, elijah.watkins@stoel.com <elijah.watkins@stoel.com>, bradley.prowant@stoel.com <bradley.prowant@stoel.com>, laura.rosenbaum@stoel.com <laura.rosenbaum@stoel.com>, mark.bieter@stoel.com <mark.bieter@stoel.com>, chostetler@freespeechforpeople.org <chostetler@freespeechforpeople.org>, abadat@naacpldf.org <abadat@naacpldf.org>, csisco@naacpldf.org <csisco@naacpldf.org>, gspencer@naacpldf.org <gspencer@naacpldf.org>, jholmes@naacpldf.org <jholmes@naacpldf.org>, koliver@naacpldf.org <koliver@naacpldf.org>, ksadasivan@naacpldf.org <ksadasivan@naacpldf.org>, vgenecin@naacpldf.org <vgenecin@naacpldf.org>, dahlrich@reedsmith.com <dahlrich@reedsmith.com>, dlopez@reedsmith.com <dlopez@reedsmith.com>, kbroughton@reedsmith.com <kbroughton@reedsmith.com>, kdulaney@reedsmith.com <kdulaney@reedsmith.com>, kpippin@reedsmith.com <kpippin@reedsmith.com>, sarah.stewart@reedsmith.com <sarah.stewart@reedsmith.com>, wakschlag@thearc.org <wakschlag@thearc.org>, dlang@gravitystack.com <dlang@gravitystack.com>, jtolbert@gravitystack.com <jtolbert@gravitystack.com>, jean.gill@bexar.org <jean.gill@bexar.org>, lisa.cubriel@bexar.org

<lisa.cubriel@bexar.org>, lroberson@bexar.org <lroberson@bexar.org>, maryann.ortegon@bexar.org <maryann.ortegon@bexar.org>, noelle.butler@bexar.org <noelle.butler@bexar.org>, Kim Barr <kim.barr@dallascounty.org>, barbara.nicholas@dallascounty.org <barbara.nicholas@dallascounty.org>, jason.schuette@dallascounty.org <jason.schuette@dallascounty.org>, ben.stool@dallascounty.org <ben.stool@dallascounty.org>, christine@statesuniteddemocracy.org <christine@statesuniteddemocracy.org>, marina@statesuniteddemocracy.org <marina@statesuniteddemocracy.org>, ranjana@statesuniteddemocracy.org <ranjana@statesuniteddemocracy.org>, robert@statesuniteddemocracy.org <robert@statesuniteddemocracy.org>, khartnett@cooley.com <khartnett@cooley.com>, mejiab@cooley.com <mejiab@cooley.com>, oarmon@cooley.com <oarmon@cooley.com>, dlouk@cooley.com <dlouk@cooley.com>, kspector@cooley.com <kspector@cooley.com>, ghabell@cooley.com <ghabell@cooley.com>, clebel@cooley.com <clebel@cooley.com>, Matteo, Nichole <nmatteo@cooley.com>, attorney@rodriguezfirm.com <attorney@rodriguezfirm.com>, sameer.birring@harriscountytexas.gov <sameer.birring@harriscountytexas.gov>, jonathan.fombonne@harriscountytexas.gov <jonathan.fombonne@harriscountytexas.gov>, Bauerband, Jacqueline (CAO) <jacqueline.bauerband@harriscountytexas.gov>, eric.nichols@butlersnow.com <eric.nichols@butlersnow.com>, karson.thompson@butlersnow.com <karson.thompson@butlersnow.com>, mckenna.tansey@butlersnow.com <mckenna.tansey@butlersnow.com>, victoria.giese@butlersnow.com <victoria.giese@butlersnow.com>, leigh.tognetti@da.co.hidalgo.tx.us <leigh.tognetti@da.co.hidalgo.tx.us>, josephine.ramirez@da.co.hidalgo.tx.us <josephine.ramirez@da.co.hidalgo.tx.us>, jacqueline.villarreal@da.co.hidalgo.tx.us <jacqueline.villarreal@da.co.hidalgo.tx.us>, michaelj.garza@da.co.hidalgo.tx.us <michaelj.garza@da.co.hidalgo.tx.us>, Leslie Dippel <Leslie.Dippel@traviscountytexas.gov>, Patrick Pope <Patrick.Pope@traviscountytexas.gov>, Gabe Hodge <Gabe.Hodge@traviscountytexas.gov>, Crosland, Stewart <scrosland@jonesday.com>, Kenny, Stephen J. <skenny@jonesday.com>, Roberts, Charles E. <cetroberts@jonesday.com>, Will Thompson <will.thompson@oag.texas.gov>, Elizabeth Saunders <elizabeth.saunders@oag.texas.gov>, Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>, Ari Herbert <ari.herbert@oag.texas.gov>, aaron.barnes@oag.texas.gov <aaron.barnes@oag.texas.gov>, Sharon Murray <Sharon.Murray@oag.texas.gov>, zachary.berg@oag.texas.gov <zachary.berg@oag.texas.gov>, kathleen.hunker@oag.texas.gov <kathleen.hunker@oag.texas.gov>

Subject: RE: LUPE v. Abbott 5:21-cv-844 | Consolidated Plaintiffs' Amended First RFPs to Defendant Intervenors

**** External mail ****

Dear John,

Please find attached Consolidated Plaintiffs' Amended First RFPs to Defendant Intervenors. As a convenience to you, I have also attached a redline showing changes from the original First RFPs served on Defendant Intervenors on July 7, 2022.

I also write to ask your availability for a meet and confer to discuss the attached requests, your December 1, 2022 document production and the pending deposition notices and subpoenas. Please let me know when you are able to meet, thank you.

Nina Perales
Vice President of Litigation
Mexican American Legal Defense
and Educational Fund, Inc. (MALDEF)
110 Broadway, Suite 300
San Antonio, TX 78205
Ph (210) 224-5476 ext. 206
FAX (210) 224-5382



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